

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

**EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,**

Plaintiff,

V.

**DILLARD'S, INC., and
DILLARD TEXAS LLC,**

Defendants.

www.pearsoned.com

CIVIL ACTION NO. 1:11cv204

JURY TRIAL DEMANDED

AGREED MOTION TO ENTER CONSENT DECREE

Plaintiff Equal Employment Opportunity Commission, and Defendants, Dillard's Inc., and Dillard Texas LLC, hereby move that the Court sign and enter the Consent Decree which is filed concurrently with this motion. In support of this motion, the parties would show as follows:

1. The parties have negotiated a resolution to this lawsuit.
2. The action at bar alleged cause of action for retaliation in violation of Title VII of the Civil Rights Act of 1964. The purposes of Title VII will be furthered by entry of the Consent Decree.
3. The Consent Decree, if entered by the Court, will resolve to the satisfaction of the parties all the issues raised in this suit. The parties therefore request the Court to approve the Consent Decree.

WHEREFORE, the parties respectfully request that the Court enter the Consent Decree which is filed with this motion.

Respectfully Submitted,

PLAINTIFF

By: /s/ Kathy D. Boutchee

Kathy D. Boutchee
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DEFENDANTS

By: /s/ Brock C. Akers

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CERTIFICATE OF CONFERENCE

I hereby certify that the parties conferred and reached agreement on the terms of relief set forth in the proposed Consent Decree and announced these terms in open court in a telephonic hearing on July 25, 2012.

/s/ Kathy D. Boutchee

Kathy D. Boutchee

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was served on all counsel of record pursuant to the U.S. District Clerk's electronic mail system on this the 31st day of July, 2012.

/s/ Kathy D. Boutchee

Kathy D. Boutchee